




HERBERT  
SMITH  
FREEHILLS

The limited relief sought is  
granted.

SO ORDERED.

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Hon. Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 1007

Dated: New York, New York  
August 22, 2023

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Date  
August 04 2023

By ECF and U.S. Mail

**Re: Tech+IP Advisory, LLC v. BlackBerry Limited,  
Case No. 1:23-cv-5996 (NRB) (S.D.N.Y.)**

Dear Judge Buchwald,

This firm represents plaintiff Tech+IP Advisory, LLC ("Tech+IP") in the above referenced action. We write jointly with counsel for defendant BlackBerry Limited ("BlackBerry") to provide the Court with an update on the confidentiality issues raised in Tech+IP's motion by order to show cause (ECF No. 1-1, the "OSC") and to seek the Court's permission pursuant to Section 2.H of Your Honor's Individual Practices to file certain documents in redacted form and/or under seal.

Tech+IP commenced this action in the Supreme Court of the State of New York, County of New York by Summons With Notice on June 9, 2023. On July 11, 2023, Tech+IP served BlackBerry with a complaint consistent with N.Y. CPLR 3012(b) (the "Complaint"). Tech+IP's Complaint contains (i) information which may be subject to a non-disclosure agreement between Tech+IP and BlackBerry dated April 1, 2020; (ii) descriptions of the terms on which third-parties were willing to purchase BlackBerry's patent assets; and (iii) references to the terms, including price terms, pursuant to which Tech+IP was willing to provide advisory services to BlackBerry. Accordingly, Tech+IP filed the OSC seeking to seal or redact portions of the Complaint. BlackBerry removed the action to this Court on July 12, 2023 (ECF No. 1).

Pursuant to the Court's instruction, the parties have conferred and agree that certain portions of the Complaint, and the exhibits thereto, should be redacted and/or filed under seal for the reasons set forth in the OSC. Accordingly, the parties respectfully request the Court's permission to file the unredacted version of the Complaint, as well as Exhibits A and B thereto, under seal with the viewing level "Selected

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Date  
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Letter to  
Hon. Naomi Reice Buchwald

Parties.”<sup>1</sup> Consistent with the ECF Rules, a redacted version of the Complaint will be filed on the public docket.

Respectfully submitted,

*/s/ Barron M. Flood*

Barron M. Flood

cc: All Counsel of Record (by ECF)

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<sup>1</sup> For the Court’s convenience, the parties have highlighted the portions of the Complaint to be redacted and/or filed under seal in yellow.